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17 UNITED STATES DISTRICT COURT  
18 DISTRICT OF NEVADA

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20 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
21 Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
others similarly situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting  
25 Championship and UFC,

26 Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**ZUFFA, LLC'S REPLY IN SUPPORT OF  
ITS MOTION TO SEAL PORTIONS OF  
PLAINTIFFS' OPPOSITION TO  
ZUFFA'S MOTION TO SEAL**

Plaintiffs’ opposition to the motion to seal filed by Defendant Zuffa, LLC (“Zuffa”) once again applies the wrong legal standard for sealing motions, and argues that Zuffa has not met that incorrect standard because of a mischaracterization of the work product at issue. Because the dispute here is duplicative of the briefing already submitted with respect to Zuffa’s Motion to Seal Portions of Plaintiffs’ Reply Brief in Support of Motion to Challenge Work Product Designation and Related Exhibits (ECF No. 305), and in an effort to reduce the burden on the Court, Zuffa respectfully refers the Court to the briefing on the prior motion and incorporates by reference the arguments contained therein. The correct standard for nondispositive motions is the “good cause” standard, and a motion to seal is clearly nondispositive. Even if the “compelling reasons” standard applied, disclosure of the disputed redactions here would reveal what Zuffa’s outside counsel considered of legal significance, which would give Zuffa’s potential adversaries insight into how outside counsel assesses Zuffa’s potential legal exposure, thus qualifying as attorney work product which may properly be sealed. As such, Zuffa’s motion should be granted.

Dated: November 3, 2016

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Stacey K. Grigsby

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Zuffa's Reply in Support of Motion to Seal Portions of Plaintiffs' Opposition to Zuffa's Motion to Seal was served on the 3rd day of November, 2016 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Michael Kim

An Employee of Boies, Schiller & Flexner